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*Attorneys for Defendant Secure Source International, LLC*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

DONALD WILLIAMS,  
Plaintiff

Case No. 2:21-cv-01900-JCM-NJK

V.

SECURE SOURCE INTERNATIONAL,  
LLC; DOES I through X, inclusive; and ROE  
CORPORATIONS I through X, inclusive.

## **STIPULATION AND ORDER FOR REMAND**

Defendant.

Plaintiff Donald Williams (“Plaintiff”) and Defendant Secure Source International, LLC (“Defendant”) (collectively, the “Parties”), through their respective counsel of record, hereby stipulate as follows:

On September 13, 2021, Plaintiff filed his Complaint in the Eighth Judicial District Court, Clark County, Nevada, Case No. A-21-840960-C, bearing the above caption.

On October 14, 2021, Defendant filed a Petition for Removal to the United States District Court for the District of Nevada on the basis that Defendant contended that this Court has diversity jurisdiction over this case under 28 U.S.C. 1332(a) [ECF No. 1].

After receiving the Petition for Removal, Plaintiff requested that Defendant stipulate to remand the case, on the basis that no diversity jurisdiction exists because Plaintiff's damages do

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1 not exceed \$75,000.00—the jurisdictional threshold for purposes of diversity jurisdiction. Should  
 2 the circumstances change, then Defendants reserve its rights under 28 U.S.C. 1332(a).

3 Plaintiff acknowledged that he does not anticipate the amount in controversy to exceed  
 4 \$75,000.00. Accordingly, Defendant agrees that the case lacks the amount in controversy to remain  
 5 in the federal court. This agreement is made in reliance upon this stipulation and the representations  
 6 made by Plaintiff's counsel regarding the amount in controversy in this matter.

7 Accordingly, the Parties hereby stipulate as follows and request that the Court enter the  
 8 proposed order filed herewith:

9 1. It is anticipated that the total amount of damages, if any, recoverable by Plaintiff in  
 10 this action against Defendant will not exceed Seventy-Five Thousand Dollars (\$75,000.00),  
 11 inclusive of all damages claims, including punitive damages claims, if any.

12 2. Because the amount in controversy for this case do not appear to exceed \$75,000.00,  
 13 this action be hereby remanded to the Eighth Judicial District Court for Clark County, Nevada.

14 3. Each party shall bear their own costs and attorneys' fees associated with the removal  
 15 and this remand.

16 IT IS SO STIPULATED.

17 Dated: October 29, 2021

17 Dated: October 29, 2021

18 SHAUN ROSE LAW LLC

18 SNELL & WILMER L.L.P.

20 By: /s/ Shaun M. Rose

21 Shaun M. Rose, Esq.  
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23 Attorney for Plaintiff Donald  
 23 Williams

20 By: /s/ Paul Swenson Prior

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23 Attorneys for Defendant Secure Source  
 23 International, LLC

26 **ORDER**

27 Upon stipulation of the Parties and good cause appearing therefor, it is hereby ORDERED,  
 28 ADJUDGED, and DECREED as follows:

1. The amount in controversy in this action does not appear to exceed \$75,000.00; and
2. Effective immediately, these proceedings are hereby remanded to the Eighth Judicial District Court for Clark County, Nevada.

**IT IS SO ORDERED.**

DATED: November 4, 2021.

James C. Mahan  
UNITED STATES DISTRICT COURT JUDGE

Respectfully submitted by:

SNELL & WILMER L.L.P.

By: /s/ Paul Swenson Prior  
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